

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

-against-

ROBERT J. MUELLER, DEEPROOT FUNDS
LLC (a/k/a dprt Funds, LLC), AND POLICY
SERVICES INC.,

Defendants,

-and-

DEEPROOT TECH LLC, DEEPROOT
PINBALL LLC, DEEPROOT STUDIOS LLC,
DEEPROOT SPORTS & ENTERTAINMENT
LLC, DEEPROOT RE 12621 SILICON DR LLC,
AND ROBERT J. MUELLER, JEFFREY L.
MUELLER, AND BELINDA G. BREEN, AS CO-
TRUSTEES OF THE MB HALE OHANA
REVOCABLE TRUST,

Relief Defendants.

Civil Action No.: 5:21-cv-785-XR

**UNOPPOSED MOTION TO EXTEND DEADLINE FOR ALL DEFENDANTS AND
RELIEF DEFENDANTS TO FILE ANSWER OR OTHER RESPONSIVE PLEADING**

TO THE HONORABLE COURT:

Defendant Robert J. Mueller (“**Mueller**”) files this Unopposed Motion to Extend the Deadline for All Defendants and Relief Defendants to File an Answer or Other Responsive Pleading, as follows:

1. On August 20, 2021, Plaintiff Securities and Exchange Commission (the “**SEC**”) filed its Complaint.

2. The Complaint named Mueller, Deeproot Funds LLC (a/k/a dprt Funds, LLC), and Policy Services, Inc. as Defendants. It named Deeproot Tech LLC, Deeproot Pinball LLC, Deeproot Studios LLC, Deeproot Sports & Entertainment LLC, Deeproot Re 12621 Silicon Dr LLC, and Robert J. Mueller, Jeffrey L. Mueller, and Belinda G. Breen, solely in their capacities as Co-Trustees of the MB Hale Ohana Revocable Trust, as Relief Defendants. Mueller is the sole owner of each of the entities named as a Defendant or Relief Defendant.

3. The deadline for Defendants and Relief Defendants to file an answer or other responsive pleading to the Complaint is currently October 19, 2021.

4. Mueller has conferred with Jeffrey L. Mueller and Belinda G. Breen, co-trustees of Relief Defendant MB Hale Ohana Revocable Trust, who are not opposed to the relief sought in this motion.

5. The undersigned counsel for Mueller has conferred with counsel for the SEC, who stated that the SEC does not oppose an extension of the time for Defendants and Relief Defendants to file an answer or other responsive pleading of thirty days – to **November 19, 2021**.

Mueller therefore respectfully requests that the Court enter an order granting the agreed extension and extending Defendants' and Relief Defendants' deadline to file an answer or other responsive pleading to the Complaint through and until November 19, 2021.

Dated: October 13, 2021

Respectfully submitted,

DAVIS & SANTOS, P.C.

By: /s/ H. Jay Hulings
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Counsel for Defendant Robert Mueller

CERTIFICATE OF CONFERENCE

I hereby certify that counsel for the undersigned counsel for Mueller conferred with David Nasse, counsel for the SEC, and he indicated that the SEC did not oppose an extension of the time for Defendants and Relief Defendants to file an answer or other pleadings in response to the Complaint by thirty (30) days.

/s/ H. Jay Hulings
H. Jay Hulings

CERTIFICATE OF SERVICE

I hereby certify that on October 13, 2021, the foregoing document was served on counsel of record via the Court's ECF system.

/s/ H. Jay Hulings
H. Jay Hulings